

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
)	
Amendment of Part 101 of the Commission's)	
Rules to Facilitate the Use of Microwave for)	WT Docket No. 10-153
Wireless Backhaul and Other Uses and to)	
Provide Additional Flexibility to Broadcast)	
Auxiliary Service and Operational Fixed)	
Microwave Licensees)	
)	
Petition for Rulemaking filed by Fixed)	RM-11602
Wireless Communications Coalition to Amend)	
Part 101 of the Commission's Rules to)	
Authorize 60 and 80 MHz Channels in Certain)	
Bands for Broadband Communications)	
)	

**COMMENTS OF
PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION**

I. INTRODUCTION

PCIA—The Wireless Infrastructure Association (“PCIA”)¹ hereby submits these comments in the above captioned dockets regarding the review of Part 101 of the Commission’s rules to promote and streamline the use of wireless backhaul. PCIA appreciates the Federal Communications Commission’s (“FCC” or “Commission”) Further Notice of Proposed Rulemaking (“FNPRM”)² on wireless backhaul as another key step toward meeting the goals of the National Broadband Plan and the ever-increasing demand for wireless services.

¹ PCIA members include carriers, infrastructure providers and professional services firms that own and manage more than 125,000 antenna structures and other telecommunications facilities throughout the world.

² *In re* Amendment of Part 101 of the Commission’s Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licensees; Petition for Rulemaking filed by Fixed Wireless Communications Coalition to Amend Part 101 of the Commission’s Rules to Authorize 60 and 80 MHz Channels in Certain Bands for Broadband

The FCC's reallocation of spectrum for wireless backhaul as part of its Broadband Acceleration Initiative is essential to develop these services to support the rapid deployment of next generation wireless services including mobile broadband. Within another Broadband Acceleration Initiative proceeding, the Broadband Acceleration Notice of Inquiry, PCIA underscores the vital relationship between new spectrum resources and the infrastructure that delivers spectrum-based services to consumers.³ Microwave backhaul services are similar to wireless subscription services in that the vital infrastructure component is highly impacted by state and local regulatory policies. While the Commission and commenters address the impact of the proposed amendments to antenna standards in Part 101 of the Commission's rules, PCIA urges the Commission to carefully weigh the benefits of adjusting its technical parameters to allow smaller backhaul antennas in the build out of wireless networks and their supporting infrastructure.

II. BY ALLOWING SMALLER BACKHAUL ANTENNAS, THE COMMISSION CAN REDUCE DEPLOYMENT COSTS AND BARRIERS

In the FNPRM, the Commission seeks comment on the savings in antenna, tower siting, and deployment costs that licensees could see from these proposed rules. As PCIA outlined in its comments in the Broadband Acceleration Notice of Inquiry, the cost of local regulatory review of collocations and modifications of existing wireless facilities can be significant, both in time and money. The addition of wireless backhaul antennas to existing infrastructure is considered a collocation or modification, and as such will often undergo a complete discretionary

Communications, *Report and Order, Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order*, FCC 10-120 (Rel. Aug. 9, 2011) ("FNPRM").

³ See generally Comments of PCIA—The Wireless Infrastructure Association and The DAS Forum, A Membership Section of PCIA, WC Docket No. 11-59, *Notice of Inquiry* (filed July 18, 2011) ("PCIA Broadband Acceleration NOI Comments"); Reply Comments of PCIA—The Wireless Infrastructure Association and The DAS Forum, A Membership Section of PCIA, WC Docket No. 11-59, *Notice of Inquiry* at 7 (filed Sept. 30, 2011) ("PCIA Broadband Acceleration NOI Reply Comments").

zoning review just the same as the underlying support structure.⁴ PCIA maintains that streamlining the review process for collocations and modifications will reduce costs for all wireless providers, including wireless backhaul providers, and encourage faster deployment.⁵ In its previous comments in this proceeding, PCIA highlighted several examples of how local review processes specifically target and impact the deployment of wireless backhaul facilities.⁶ As the Commission recognized, the cost ratio of building a new facility versus siting on an existing facility is roughly ten to one.⁷ By adjusting its technical parameters to allow the use of smaller backhaul antennas, the Commission can facilitate the efficient use of existing infrastructure.

PCIA urges the Commission to take action consistent with its comments in the Broadband Acceleration NOI to combat this unnecessary re-review of approved infrastructure.⁸ At the same time, the proposed rules in this proceeding will immediately impact the discretionary zoning and permitting process, allowing providers to deploy wireless backhaul antennas with less visual impact. Aesthetics are often cited as a core reason proposed wireless facilities, including collocation and modifications, are denied permitting and zoning approval. Reducing the size in antennas can deter these findings, and quicken deployment, resulting in fewer resources sunk into the zoning and permitting process.⁹

⁴ See Comments of PCIA – The Wireless Infrastructure Association, WT Docket No. 10-153 WT Docket No. 09-106 WT Docket No. 07-121, *Notice of Proposed Rulemaking and Notice of Inquiry*, at 3-4 (filed Oct. 25, 2010) (“PCIA Wireless Backhaul Comments”); see also PCIA Broadband Acceleration NOI Comments at 18-20.

⁵ See PCIA Broadband Acceleration NOI Comments at 18-26.

⁶ See PCIA Wireless Backhaul Comments at 3-4.

⁷ *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, Fifteenth Report, FCC 11-103, at ¶ 312 (Jun. 27, 2011) (“*Fifteenth Competition Report*”).

⁸ PCIA Broadband Acceleration NOI Comments; PCIA Broadband Acceleration NOI Reply Comments.

⁹ See PCIA Broadband Acceleration NOI Comments at 22-26 (noting the reduction of cost from streamlining the review process for collocations and modifications).

Finally, as several commenters raise and the FCC notes in its FNPRM, the cost of leasing space on wireless infrastructure for wireless backhaul antennas can be reduced with smaller antennas.¹⁰ While the lease terms for the placement of antennas on wireless facilities varies based on numerous factors, in general the cost of the lease is based on the size and loading of the antennas. Therefore, a reduction in the size and load of the antenna will proportionately decrease the cost of leasing space on a wireless facility. Though lease terms may vary, savings are to be found in the deployment of smaller wireless backhaul antennas.

¹⁰ *FNPRM* at ¶ 73, citing Comments of Aviat Networks, WT Docket No. 10-153 WT Docket No. 09-106 WT Docket No. 07-121, *Notice of Proposed Rulemaking* and *Notice of Inquiry*, at 3 (filed Oct. 25, 2010); Comments of FiberTower Corporation, WT Docket No. 10-153 WT Docket No. 09-106 WT Docket No. 07-121, *Notice of Proposed Rulemaking* and *Notice of Inquiry*, at 13 (filed Oct. 25, 2010); Comments of Motorola, Inc., WT Docket No. 10-153 WT Docket No. 09-106 WT Docket No. 07-121, *Notice of Proposed Rulemaking* and *Notice of Inquiry*, at 10 (filed Oct. 25, 2010); Comments of Sprint Nextel Corporation, WT Docket No. 10-153 WT Docket No. 09-106 WT Docket No. 07-121, *Notice of Proposed Rulemaking* and *Notice of Inquiry*, at 8 (filed Oct. 25, 2010).

III. CONCLUSION

For the foregoing reasons, PCIA urges Commission to adopt rules to streamline the collocation review process for all antennas including microwaves, and allow wireless service providers to efficiently utilize existing infrastructure through the use of smaller microwave backhaul antennas.

Respectfully submitted,

PCIA – THE WIRELESS
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